

**BSEE**  
**Bureau of Safety and Environmental**  
**Enforcement**

**NATIONAL POTENTIAL INCIDENT**  
**OF NONCOMPLIANCE (PINC) AND**  
**GUIDELINE LIST**



# PREFACE

LAST UPDATE May 2015

The Offshore Safety Improvement Branch (OSIB) of the Office of Offshore Regulatory Programs (OORP) wish to extend our appreciation to all participating BSEE personnel and especially the District representatives for their dedicated effort and expertise in providing BSEE Inspection Program with this edition of the National PINC and Guideline List.

## **Revisions to Guidelines for the National PINC List**

The following format is presented as a means for BSEE personnel to suggest revisions to the Guidelines to the National PINC List. All suggested revisions will be reviewed by the PINC List Revision Work Group. Before revisions are included in the National PINC List they will be routed to the Regional Supervisors/Field Operations, or their staff, for review and comment. Please submit suggested revisions by email to [pincteam@bsee.gov](mailto:pincteam@bsee.gov) or by mail to:

Bureau of Safety and Environmental Enforcement  
PINC List Revision Work Group Offshore Safety Improvement Branch  
Mail Stop – VAE-ORP  
45600 Woodland Road  
Sterling, VA 20166

## **Suggested Revision Format:**

PINC Number:  
Enforcement Action:  
Definition:  
Inspection Procedure:  
If Noncompliance Exists:  
Inspection Form:  
Rationale:

## **Please be advised:**

The guidelines in this document are to be considered the most preferable way of implementing the inspection and enforcement of each PINC and not intended as a directive or to supersede the regulatory language of Title 30 of the Code of Federal Regulations.

Also, the enforcement status of a Facility Shut-in (S) INC or a Component Shut-in (C) INC may not necessarily require the full extent of the enforcement specified. The Inspector has full authority to use their discretion when issuing a Component Shut-in (C) INC. **However, when issuing a Facility Shut-in INC the Inspector must solicit approval from the District Manager or Supervisory Inspector prior to the actual shut-in of a facility.** The only exception to this requirement is when there is an imminent danger to personnel, property, or the environment, exacting a more immediate BSEE response.

## **DESCRIPTION OF THE GUIDELINES TO THE NATIONAL PINC LIST**

The Guidelines to the National PINC List establish the procedures for the inspection of lessee operations and facilities by BSEE personnel. The use of these guidelines for all inspections will result in an inspection program that is both fair and consistent in all OCS waters. The information provided in the Guidelines to the National PINC List is shown in the following outline of the format:

**PINC NUMBER:** A unique identifier for the specific requirement.

**PINC STATEMENT:** The clear and concise description of the requirement.

**AUTHORITY:** The regulatory authority as found in the Code of Federal Regulations.

**ENFORCEMENT ACTION:** This is the enforcement action(s) that must be taken by BSEE for an identified violation(s) of the regulations. Enforcement action(s) may result in a complete facility shut-in (S), a component shut-in (C), or a warning (W). A substantial number of the Potential Incidents of Noncompliance (PINC) provide enforcement actions in all three enforcement categories [W/C; W/C/S]. Multiple enforcement action(s) [W/C; W/C/S] may be issued to document severity of identified violations. When multiple enforcement actions [W/C or W/C/S] are provided in the PINC, the criteria for each level of enforcement action are provided in the "IF NONCOMPLIANCE EXISTS" section of the PINC.

**RATIONALE/NOTE:** Additional information describing the basis or providing background information pertinent to the requirement stated in the "PINC Statement" block.

**DEFINITION:** Definitions of terms used in the PINC.

**INSPECTION PROCEDURE:** Preferred detailed guidelines to be used by BSEE personnel to ensure that the stated requirement is met. **However, the guidelines in this document are to be considered the preferable method of implementing the enforcement of each PINC and not intended as a directive or to supersede the regulatory language in the Code of Federal Regulations.**

**INSPECTION COUNT:** Describes the number of items checked to be entered on the inspection form. An incident of noncompliance (INC) must be issued to document any negative (no) answer to a PINC statement.

Examples:

**1. Enter one item checked per facility inspected.**

One (1) is entered in the "# CK" column on the inspection form and answered one [1] in the "#Y" or "#N".

**2. Enter one item checked for each safety device inspected.**

A total count of the number of safety devices, components, wells, etc., is entered in the "#CK" column on the inspection form. The total entries in the "#Y", "#N", and "#N/A" columns must correspond to the total count in the "#CK" column.

**IF NONCOMPLIANCE EXISTS:** Describes the specific enforcement action to be taken for each identified violation and the severity level of each violation of the regulations. Examples:

1. Issue a warning (W) incident of noncompliance when the situation poses no immediate danger to personnel or equipment.
2. Issue a component (C) incident of noncompliance for a specific piece of equipment or location when it is determined to be part of an unsafe situation or it poses an immediate danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.
3. Issue a structure (S) incident of noncompliance when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

**INCIDENT(S) OF NONCOMPLIANCE TO BE ISSUED/ INC COUNT:** Dictates the specific number of incident(s) of noncompliance to be issued for identified violation(s) of the regulations. Examples:

**1. Issue one incident of noncompliance for each facility inspected.**

One (1) incident of noncompliance is issued on each facility inspected with detailed bullet descriptions of the identified violations. Exception to the one incident of noncompliance per facility inspected rule is when multiple enforcement actions [W/C or W/C/S] are provided in the PINC. PINCs with multiple enforcement action(s) [W/C; W/C/S] may dictate that multiple incidents of noncompliance are issued per facility to document severity levels of violations. Such cases will result in the issuance of one incident of noncompliance for the appropriate selected enforcement action with detailed bullet descriptions of the identified violations.

**2. Issue one incident of noncompliance for each safety device inspected.**

One (1) incident of noncompliance is issued for each safety device, component, well, etc., that is determined to be in violation of the regulations.

**Should an immediate shut-in increase the risk to safety or pollution, a statement on the INC shall indicate when the shut-in is to take effect. In an after-the-fact situation where no correction is possible, a warning (W) INC will normally be issued, since a shut-in would serve no useful purpose. However, an after-the-fact INC that may result in Civil Penalty Review (CPR) recommendation should be issued with the appropriate shut-in enforcement action. Should an immediate shut-in increase the risk to safety or pollution, a statement on the INC shall indicate when the shut-in is to take effect. In an after-the-fact situation where no correction is possible, a warning (W) INC is issued, since a shut-in would serve no useful purpose.**

## **ACRONYMS USED**

### **Enforcement Actions**

**W** Warning

**C** Component Shut-in

**S** Facility (Platform/Rig) Shut-in

### **Documents Referenced**

**ASME BPVC** ASME Boiler and Pressure Vessel Code

**ANSI/ASME SPPE-1** Quality Assurance and Certification of Safety and Pollution Prevention Equipment Used in Oil and Gas Operations

**ANSI Z88.2** Practices for Respiratory Protection

**API RP 2D** API Recommended Practice for Operation and Maintenance of Offshore Cranes

**API RP 13B** API Recommended Practice Standard Procedure for Field Testing Drilling Fluids

**API RP 14B** API Recommended Practice for Design, Installation, Repair and Operation of Subsurface Safety Valve Systems

**API RP 14C** API Recommended Practice for Analysis, Design, Installation and Testing of Basic Surface Safety Systems for Offshore Production Platforms

**API RP 14F** API Recommended Practice for Design and Installation of Electrical Systems for Offshore Production Platforms

**API RP 14G** API Recommended Practice for Fire Prevention and Control on Open Type Offshore Production Platforms

**API RP 500** API Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Division 1 and Division 2

**API RP 505** API Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Zone 0, Zone 1, and Zone 2

## **Documents Referenced (cont.)**

**API RP T2**                      API Recommended Practice for Qualification Programs for Offshore Production Personnel Who Work with Anti-pollution Safety Devices

**ASME B30.4c**                Portal, Tower, and Pedestal Cranes

## **Other Acronyms:**

<b>ANSI</b>	American National Standards Institute
<b>APD</b>	Application for Permit to Drill
<b>API</b>	American Petroleum Institute
<b>APM</b>	Application for Permit to Modify
<b>ASME</b>	American Society of Mechanical Engineers
<b>ATC</b>	Automatic Temperature Compensator
<b>ATG</b>	Automatic Temperature Gravity
<b>Bar</b>	1 x 10 <sup>6</sup> dynes per square centimeter
<b>bbl</b>	Barrel
<b>BDV</b>	Blowdown Valve
<b>BOP</b>	Blowout Preventer
<b>BSL</b>	Burner Flame Detector (burner safety low)
<b>BSEE</b>	Bureau of Safety and Environmental Enforcement
<b>ccs</b>	Cubic centimeters per second
<b>CFR</b>	Code of Federal Regulations
<b>DOCD</b>	Development Operations Coordination Document
<b>EOR</b>	End of Operations Report
<b>ESD</b>	Emergency Shutdown
<b>FSL</b>	Low Flow Sensor (flow safety low)
<b>FSV</b>	Flow Safety Valve (check valve)
<b>gpm</b>	Gallons per minute
<b>hp</b>	Horsepower
<b>H<sub>2</sub>S</b>	Hydrogen Sulfide
<b>ID</b>	Identification
<b>INC</b>	Incident of Noncompliance
<b>PINC</b>	Potential Incident of Noncompliance
<b>LEL</b>	Lower Explosive Limit
<b>LSH</b>	Level Safety High (high level sensor)
<b>LSL</b>	Level Safety Low (low level sensor)
<b>MAOP</b>	Maximum Allowable Operating Pressure
<b>MASP</b>	Maximum Anticipated Surface Pressure
<b>MODU</b>	Mobile Offshore Drilling Unit
<b>MPMS</b>	Manual of Petroleum Standards
<b>MWD</b>	Measurement-while-drilling
<b>OCS</b>	Outer Continental Shelf
<b>od</b>	Outside diameter

**Other Acronyms (cont.):**

<b>°F</b>	Degrees Fahrenheit
<b>pcf</b>	Pounds per cubic foot
<b>PFD</b>	Personal Flotation Device
<b>pH</b>	Measure of acidity and alkalinity (potential of hydrogen)
<b>POE</b>	Plan of Exploration
<b>ppg</b>	Pounds per gallon
<b>ppm</b>	Parts per million
<b>PSH</b>	Pressure Safety High (high pressure sensor)
<b>psi</b>	Pounds per square inch
<b>psig</b>	Pounds per square inch gauge
<b>PSL</b>	Pressure Safety Low (low pressure sensor)
<b>PSV</b>	Pressure Safety Valve (pressure relief valve)
<b>PTO</b>	Power Take off
<b>SAC</b>	Safety Analysis Checklist
<b>SAFE</b>	Safety Analysis Function Evaluation
<b>SCADA</b>	Supervisory Control and Data Acquisition
<b>SCSSV</b>	Surface Controlled Subsurface Safety Valve
<b>SDV</b>	Shutdown Valve
<b>SITP</b>	Shut-in Tubing Pressure
<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>SSCSV</b>	Subsurface Controlled Subsurface Safety Valve
<b>SSSV</b>	Subsurface Safety Valve
<b>SSV</b>	Surface Safety Valve
<b>TSE</b>	Temperature Safety Element (fusible material)
<b>TSH</b>	Temperature Safety High (high temperature sensor)
<b>TSL</b>	Temperature Safety Low (low temperature sensor)
<b>TVD</b>	True Vertical Depth
<b>USV</b>	Underwater Safety Valve
<b>UV</b>	Ultraviolet
<b>WOC</b>	Waiting On Cement
<b>WP</b>	Working Pressure

# TABLE OF CONTENTS

LAST UPDATE 2015

## General Guidelines

Identity .....	G-100 thru G-101
Operations .....	G-110 thru G-116
Records .....	G-117
Accident Reporting.....	G-131 thru G-132
Engines .....	G-150 thru G-156
Marking of Equipment .....	G-250 thru G-253
Welding and Burning .....	G-300 thru G-306
Welding and Burning Operations Outside Approved Areas .....	G-309 thru G-317

## Pollution Guidelines

Prevention .....	E-100 thru E-108
Inspections and Reports .....	E-120 thru E-123
Artificial Islands .....	E-200 thru E-202

## Drilling Operations Guidelines

Traveling Block .....	D-100 thru D-101
Directional Survey .....	D-110 thru D-113
Moving Drilling Rigs .....	D-120 thru D-121
ESD System .....	D-130
Casing Program .....	D-150 thru D-179
BOP Systems and Components .....	D-200 thru D-227
Surface BOP System .....	D-231 thru D-232
Subsea BOP Systems .....	D-240 thru D-249
BOP Tests, Actuators, Inspections, and Maintenance .....	D-250 thru D-269
Surface BOP Tests .....	D-270 thru D-274
Subsea BOP Tests .....	D-281 thru D-285
Well-Control Drills .....	D-290 thru D-292
Diverter Systems .....	D-300 thru D-314
Surface Diverter Systems .....	D-315 thru D-334
Drilling Fluid Program .....	D-400 thru D-416
Classified Drilling Fluid-Handling Areas .....	D-421 thru D-429

## Drilling Operations Guidelines (cont.)

Securing of Wells .....	D-440
Supervision, Surveillance, and Training .....	D-450 thru D-453
Applications for Permit to Drill .....	D-460 thru D-463
BOP Systems Maintenance/Inspection/Certification.....	D-500 thru D-504
Subsea BOP System.....	D-600 thru D-604



Stump Test .....	D-610 thru D-611
Initial Installation Test .....	D-612 thru D-613

## **Well-Completion Guidelines**

Well-Completion Operations .....	C-100 thru C-113
BOP Operations for Well-Completions. ....	C-114 thru C-128
BOP Tests, Actuators, Inspections, and Maintenance .....	C-129 thru C-156
ESD System .....	C-160
BOP Test/Actuation/Inspections/Maintenance.....	C-170 thru C-181
Blowout Preventer Systems Tests, Inspections, and Maintenance.....	C-182 thru C-185
BOP Tests, Actuators, Inspections, and Maintenance.....	C-186 thru C-191

## **Well-Workover Guidelines**

Well-Workover Operations .....	W-100 thru W-113
BOP Well-Workover Operations .....	W-114 thru W-163
Wireline Operations .....	W-170 thru W-172
ESD System .....	W-180
BOP Test/Actuation /Inspection and Maintenance.....	W-190 thru W-202
Stump Test.....	W-203 thru W-205
BOP Tests, Actuators, Inspection, and Maintenance.....	W-206 thru W-213

## **Abandonment of Wells Guidelines**

Permanent Abandonment .....	A-100 thru A-111
Temporary Abandonment .....	A-114 thru A-168
Subsea BOP Test/Actuation/Inspection and Maintenance.....	A-190 thru A-201
Subsea BOP Stump Test.....	A-221 thru A-224
BOP Tests, Actuators, Inspections, and Maintenance.....	A-240 thru A-246

## **Production Operations Guidelines**

General .....	P-100 thru P-105
Flaring and Venting of Gas .....	P-107 thru P-114
Production Notification.....	P-120
Fire Water System .....	P-130 thru P-133
Gas-Detection System .....	P-150 thru P-155
Fire-Detection System .....	P-170 thru P-177
Fusible Material .....	P-200 thru P-209
ESD System .....	P-231 thru P-243
Subsurface Safety Devices .....	P-260 thru P-271
Subsurface Safety Device Testing .....	P-280 thru P-284
Surface Safety Device Testing .....	P-300 thru P-317
Records .....	P-320
Non-Pipeline Pumps .....	P-340 thru P-344

Gas Lift and Injection Lines .....	P-361 thru P-364
Headers .....	P-380 thru P-381
Wellhead and Flowlines .....	P-402 thru P-412
Tubing and Wellhead Equipment.....	P-413
Casing and Pressure Management.....	P-414 thru P-418
Pressure Vessels .....	P-422 thru P-434
Relief Valves .....	P-451 thru P-452
Atmospheric Vessels .....	P-470 thru P-475
Fired and Heated Components .....	P-520 thru P-533
Steam Generators .....	P-540 thru P-542
Heat Exchangers .....	P-550 thru P-551
Compressors .....	P-562 thru P-576

## **Pipeline Guidelines**

Operational Pipelines .....	L-102 thru L-127
Out-of-service Pipelines .....	L-140 thru L-143

## **Production Measurement and Site Security Guidelines**

Measurement of Liquid Hydrocarbons .....	M-100 thru M-142 and M-150
Run Tickets .....	M-143 thru M-144
Measurement of Gas .....	M-200 thru M-210
Surface Production and Commingling .....	M-248 thru M-251
Site Security .....	M-298 thru M-310

## **Hydrogen Sulfide Guidelines** ..... H-100 thru H-181

## **Crane Lifting Operations Guidelines**

Operating procedures .....	I-101 thru I-105
Crane Safety Devices.....	I-111 thru I-117
Load Rating and Tests .....	I-131 thru I-134
Crane Inspections.....	I-141 thru I-147
Repairs and Alterations.....	I-151 thru I-153
Slings .....	I-161 thru I-162
Certification.....	I-171
Personnel Qualifications .....	I-181 thru I-183
Material Handling.....	I-190

## **Electrical Systems Guidelines**

Classified Areas .....	F-101
Batteries .....	F-103
Lighting Fixtures .....	F-104
Portable Electrical/Electronic devices.....	F-105 thru F-106

Installation/Maintenance .....	F-108
Wiring and Grounding.....	F-121 thru F-128
Lockout/Tagout Procedures.....	F-141
Nameplate Information.....	F-161

<b>Personal Safety Guidelines (USCG) .....</b>	<b>Z-100 thru Z-210</b>
--	-------------------------

## Appendices

Testing Procedure for PSH and PSL .....	Appendix 1
Testing Procedure for LSH and LSL .....	Appendix 2
Testing Procedure for TSH and TSL .....	Appendix 3
Testing Procedure for PSV .....	Appendix 4
Testing Procedure for FSV .....	Appendix 5
Testing Procedure for BSL .....	Appendix 6
Testing Procedure for SDV .....	Appendix 7
Testing Procedure for SSV/USV .....	Appendix 8
Testing Procedure for SCSSV, Tubing Plug, and Injection Valve .....	Appendix 9
Testing Procedure for ESD and Fire Loop System .....	Appendix 10
Testing Procedure for FSL .....	Appendix 14
Testing Procedure for Motor Starter Interlock .....	Appendix 16
Testing Procedure for Flame Arrester .....	Appendix 17
Testing Procedure for Water-Feeding Device .....	Appendix 19
Electrical Installation Requirements .....	Appendix 20
Area Classification .....	Appendix 21
Well-Control Drill Requirements .....	Appendix 22
BOP System and Auxiliary Equipment .....	Appendix 23
Crane Use Categories and Inspections .....	Appendix 24
Pit Volume Totalizer Test Procedure .....	Appendix 25